#### IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

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In re	Chapter 11
BRAC GROUP, INC (f/k/a Budget Group, Inc), et al.,	Case No 02-12152 (MFW)
Debtors	(Jointly Administered)
BRAC GROUP, INC (f/k/a Budget Group, Inc.), et al.,	
Plaintiffs,	03-A-54271
V.	
Jaeban (U.K.) Limited,	
Defendant	

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# CERTIFICATION OF COUNSEL REGARDING REVISED PRE-TRIAL SCHEDULING ORDER

On June 22, 2004, a pre-trial status conference (the "Pre-Trial Conference") was held before this Court in the above-captioned adversary proceeding (the "Adversary Proceeding") At the Pre-Trial Conference, the parties to the Adversary Proceeding promised to submit a revised pre-trial scheduling order Attached hereto as Exhibit A is a revised pre-trial scheduling order (the "Scheduling Order")

The plaintiffs in the Adversary Proceeding, request that the Court enter the

Scheduling Order at its earliest convenience without further notice or hearing

Dated: July 1, 2004

YOUNG CONAWAY STARGATT & TAYLOR, LLP

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Robert S. Brady (No 2847)
Edmon L. Morton (No 3856)
Matthew B. Lunn (No 4119)
The Brandywine Building
1000 West Street, 17th Floor
P.O. Box 391
Wilmington, Delaware 19801

-and-

SIDLEY AUSTIN BROWN & WOOD Larry J Nyhan Matthew A Clemente 10 South Dearborn Street Chicago, IL 60603 Tel: (312) 853-7000

Facsimile: (312) 853-7036

Attorneys for Plaintiffs

## EXHIBIT A

### IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re

BRAC GROUP, INC (f/k/a Budget Group, Inc),
et al,

Debtors

(Jointly Administered)

BRAC GROUP, INC (f/k/a Budget Group, Inc),
et al,

Plaintiffs,

O3-A-54271

V

Jaeban (U K ) Limited,

Defendant

#### REVISED PRE-TRIAL SCHEDULING ORDER

Due notice having been given and all parties having appeared and been heard, IT IS ORDERED AS FOLLOWS:

- All depositions in this adversary proceeding shall be completed by August 23, 2004.
  - 2 Motions for summary judgment shall be filed by September 17, 2004
  - 3 Memoranda in opposition to summary judgment shall be filed by October 1, 2004
  - 4 Reply memoranda in support of summary judgment shall be filed by October 8,
- 5 With respect to BRACII's Motion for Partial Reconsideration and BRACII'S

  Motion for a Four-Day Extension of Time to File Its Motion for Reconsideration, Defendant's

2004

objections shall be filed by June 25, 2004 BRACII's reply shall be filed by July 9, 2004 The Court will hold a hearing on these motions at 9:30 a m on July 15, 2004 in its Wilmington,

Delaware courtroom

- 6 With respect to the parties' proposed further pleadings (an amended counterclaim by Defendant and a claim by BRACII against Mr I M Jaeban on his personal guarantee),
  BRACII and Defendant shall exchange proposed final pleadings by July 9, 2004 Unless a party objects in writing to the amended pleading by July 14, 2004, it shall answer or otherwise plead by July 23, 2004 If a party does object to an amended pleading, a briefing schedule shall be established at the July 15, 2004 hearing
- Any renewed motion by BRACII to strike the pleadings of or otherwise seek a default judgment against Jaeban (U K) Limited in its capacity as a defendant shall be filed on July 16, 2004, subject to further order of the Court at the July 15, 2004 hearing
- Any party that wishes to file a motion seeking the transfer of this proceeding to another court shall file such motion by July 12, 2004.

#### SO ORDERED:

United States Bankruptcy Judge	
	United States Bankruptcy Judge